Office of the Under Secretary of Defense (Installations and Environment) Environmental Management Directorate

MRSPP Review & Update (and other Good Stuff)

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Mr. Victor Wieszek
ODUSD(I&E)/EM

Overview

- Policy Update
- Goals and Metrics
- Program Status and Update

Policy Update

Munitions Response Site Prioritization Protocol (MRSPP)

- Review MRSPP policy documents (e.g., MRSPP, MRSPP Primer, QA/QC Guidance)
  - DoD Components submitted comments on suggested changes to MRSPP policy documents
  - MRSPP policy subgroup to review and comment
  - Obtain additional information on the current program if necessary (e.g., review MRSPP scores, distribution of sites without scores)
- Weigh the risks and benefits of changing the MRSPP
- Project underway and ongoing
  - Timeframe to complete depends on issues identified and changes required to address the issues

QA/QC Policy

- Some of the DoD Components have developed sampling-based approaches for QA
- Define parameters for a sampling-based approach for QA review of MRSPP application
  - Process for determining statistically valid sample size
    - Application to all sites or exclude low scoring sites (e.g., small arms ranges)
  - Acceptable margin of error
- Reduce burden while improving consistency and maintaining appropriate level of oversight
- Priority project, but not currently underway

Sequencing Policy

- GAO published *Military Munitions Response Program, Opportunities Exist to Improve Program Management in* April 2010
  - No consistent DoD approach for considering factors other than risk in sequencing MRSs
  - The Army and Air Force have begun to independently develop their own approaches for sequencing
  - The Navy has not yet determined if sequencing guidance is needed
- A copy of the report is available at http://www.gao.gov/cgi-bin/getrpt?GAO-10-384

Sequencing Policy (cont.)

- The MRSPP states that the sequencing of MRSs will be primarily based on the relative priority

- Generally, an MRS that presents a greater relative risk will be sequenced for cleanup ahead of an MRS that presents a lower risk

- However, the MRSPP Final Rule states that other "risk-plus" factors warrant consideration in sequencing:
  - Regulator and stakeholder concerns
  - Mission-driven requirements
  - Cultural and social factors
  - Economic factors
  - Reasonably anticipated future land use

Sequencing Policy (cont.)

- The MRSPP requires DoD to ensure that stakeholders are offered opportunities to participate in the application of the MRSPP and sequencing decisions

- The MRSPP also requires the DoD Components to report justification for all out of order sequencing decisions to OSD.

GAO Recommendations on Sequencing Policy

- GAO recommended that DoD develop guidance, outlining a consistent approach for considering factors other than relative risk, for the DoD Components on sequencing MRS
  - Assign site priorities in a consistent and transparent fashion
  - Consider the same range of other factors in sequencing decisions and assess the significance of these factors in a consistent way
- DoD partially concurred with GAO's recommendation
- DoD's position on sequencing:
  - DoD believes the MRSPP and MRSPP Primer provide sufficient sequencing guidance at this time
  - Flexibility to consider site- specific factors as appropriate

Sequencing Policy Next Steps

- In the near future, OSD will assess the DoD Components practices in sequencing
  - Collect and evaluate information and lessons learned
- OSD will use this information to determine if additional guidance is necessary
- High priority project, but not currently underway
  - Timeframe – in the near future when the DoD Components have sufficient experience in sequencing their MRSs

Munitions and Explosives of Concern Hazard Assessment (MEC HA)

- The MEC HA allows a project team to evaluate the potential explosive hazard associated with an MRS , given current conditions and under various cleanup, land use activities, and land use control alternatives
- The results of the MEC HA can provide input into the remedy evaluation and selection process
- Current MEC HA trial expired in January 2011
- OSD is issuing an extension of the Interim MEC HA trial use and evaluation period for an additional two years to gain the necessary experience with the tool
- At the conclusion of the next two-year period OSD will evaluate the tools effectiveness based on DoD Component input

No Further Action (NFA) Initiative

- OSD study in Spring 2010 highlighted inconsistent forms of NFA regulatory concurrence from state regulators
  - Official “concurrence”
    - Received from state environmental regulatory agencies on agency letter head
    - Singed by an authorized official offering unreserved agreement with the recommendations
  - Informal “concurrence”
    - E-mail documentation, meeting minutes, and other informal correspondence implying concurrence
- OSD working to develop a template for NFA concurrence
  - Team with Association of State and Territorial Solid Waste Management Officials (ASTSWMO)
  - Improve overall communication, transparency, and project management

Goals and Metrics

Advancing MMRP Cleanup Progress

- DERP goals stimulate cleanup progress and help the DoD components defend their budgets

- Existing DERP goals and progress against these goals

Military Munitions Response Program	FY06	FY07	FY08	FY09	FY10
Active Installations					
Complete PAs at all MRSs by the end of FY07	70%	**96%**	**95%**	**97%**	**96%**
Complete SIs at all MRSs by the end of FY10	24%	29%	51%	72%	**97%**
Achieve RIP/RC at all MRSs by the end of FY20	17%	23%	34%	43%	38%
BRAC Installations					
Achieve RIP/RC at all Legacy BRAC MRSs by the end of FY09	38%	63%	67%	68%	70%
Achieve RIP/RC at all BRAC 2005 MRSs by the end of FY17	0%	20%	27%	33%	39%
FUDS Properties					
Complete PAs at all MRSs by the end of FY07	**99%**	**99%**	**99%**	**96%**	**98%**
Complete SIs at all MRSs by the end of FY10	34%	45%	58%	67%	84%

Advancing MMRP Cleanup Progress (cont.)

- Cleanup at MRSs is beginning in earnest now that the DoD Components have completed preliminary assessments (PAs) and site inspections (SIs)
- OSD is developing goals to promote cleanup beyond RIP
- Established the DoD Metrics Subcommittee in January 2011
  - Two representatives for each DoD Component
  - Meets every 3-4 weeks to discuss new goals and metrics for advancing MMRP cleanup

Advancing MMRP Cleanup Progress (continued)

- OSD leadership and the DoD Component Deputy Assistant Secretaries are briefed regularly on the progress of the Subcommittee

- New goals being worked
  - RC at active, BRAC, and FUDS for IPR, MMRP, and Compliance Cleanup sites
  - RIP for FUDS MMRP
  - MRSPP Evaluation Pending goal (i.e. a goal to reduce the number of MRSs with a MRSPP determination of “evaluation pending”)
  - Others, as needed

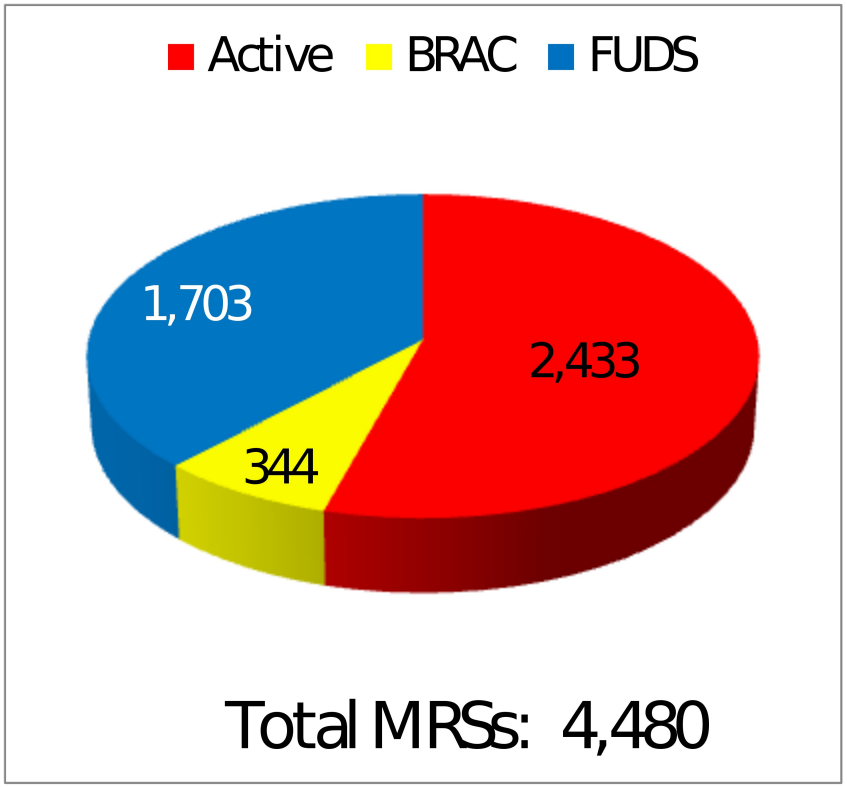
Program Overview and Status Update

Bottom Line on MMRP Progress

- Cleanup is progressing at Munitions Response Sites (MRSs)
  - Achieved statutory goal by completing site inspections at **97 percent** of munitions response sites on active installations in FY10
  - Decreased the MMRP cost-to-complete estimates on active installations, Base Realignment and Closure (BRAC) installations, and Formerly Used Defense Sites (FUDS) properties by **11 percent**.

MMRP Inventory

The MRS inventory breaks out as follows:



- Increase in MRSs on active installations from FY09
  - Army National Guard Bureau non-DoD owned, non-operational defense sites
  - Air Force conducting an additional inventory and splitting MRSs into smaller sites
- The inventory is updated annually - http://deparc.xservices.com/do/mmrp

MMRP President's Budget in Millions

Military Munitions Response Program

	FY2010 Actuals	FY2011 Estimate^	FY2012 Request
Active Installations	$247.1	$216.1	$250.4
FUDS	$168.8	$89.1	$94.9
Legacy BRAC*	$41.1	$37.7	$56.9
BRAC 2005*	$3.2	$22.7	$31.7
Total	$460.2	$365.6	$433.8

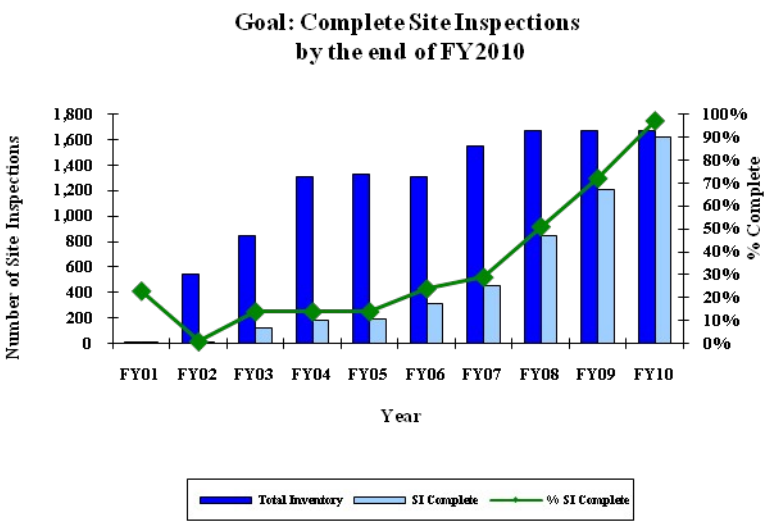
*** Excludes BRAC Planning and Compliance funding**

^ Reflects an adjustment to match the Annualized Continuing Resolution funding level by appropriation

MMRP Cleanup at Active Installations

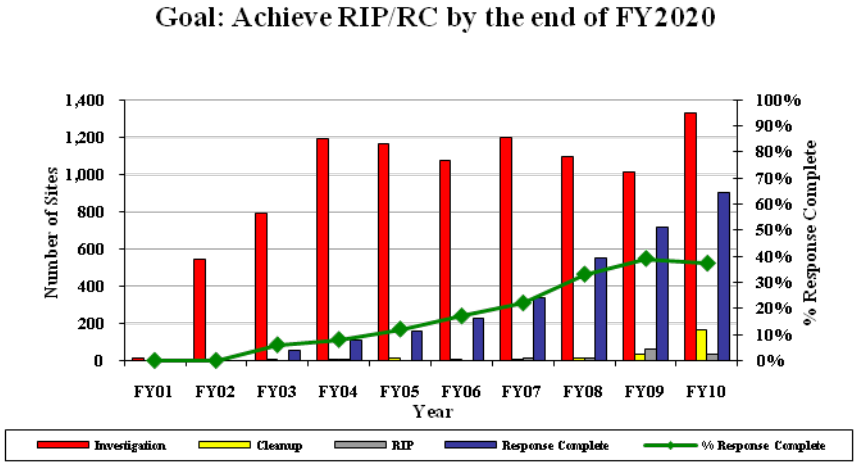
FY10 Accomplishments

- Achieved site inspection goal
  - 25% increase since FY2009
- Achieved RC at 187 sites


Goal: Complete Site Inspections by the end of FY2010
Number of Site Inspections
% Complete
Year
FY01 FY02 FY03 FY04 FY05 FY06 FY07 FY08 FY09 FY10
Total Inventory
SI Complete
% SI Complete

FY11 Projections

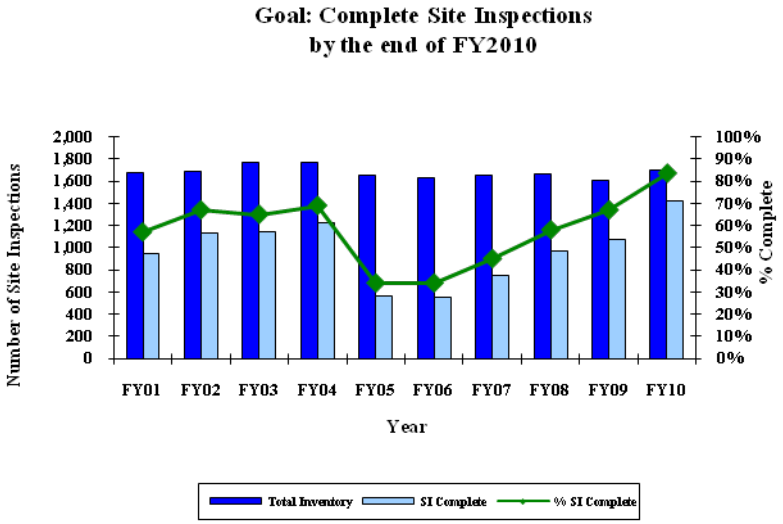
- Complete final study phase at 126 sites
- Achieve RC at 60 sites



MMRP Cleanup at FUDS Properties

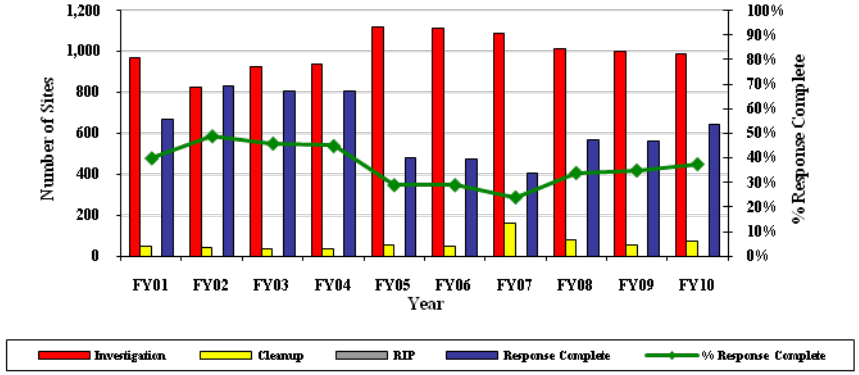
FY10 Accomplishments

- Completed site inspections at 349 sites
  - 17% increase since FY2009
- Achieved RC at 79 sites
  - 3% increase since FY2009


Goal: Complete Site Inspections by the end of FY2010
Number of Site Inspections
% Complete
Year
FY01 FY02 FY03 FY04 FY05 FY06 FY07 FY08 FY09 FY10
Total Inventory
SI Complete
% SI Complete

FY11 Projections

- Complete site inspections at 163 sites
- Complete final study phase at 48 sites



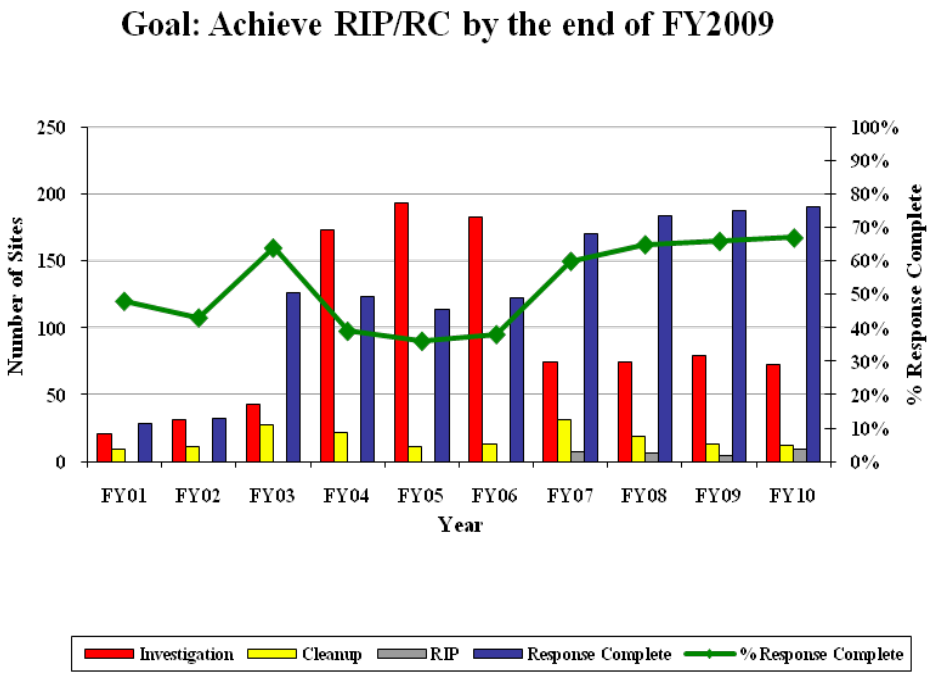
MMRP Cleanup at Legacy BRAC Installations

FY10 Accomplishments

- Completed final study phase at 6 sites
- Achieved RIP at 5 sites
  - 2% increase since FY2009

FY11 Projections

- Complete final study phase at 22 sites
- Achieve RC at 25 sites



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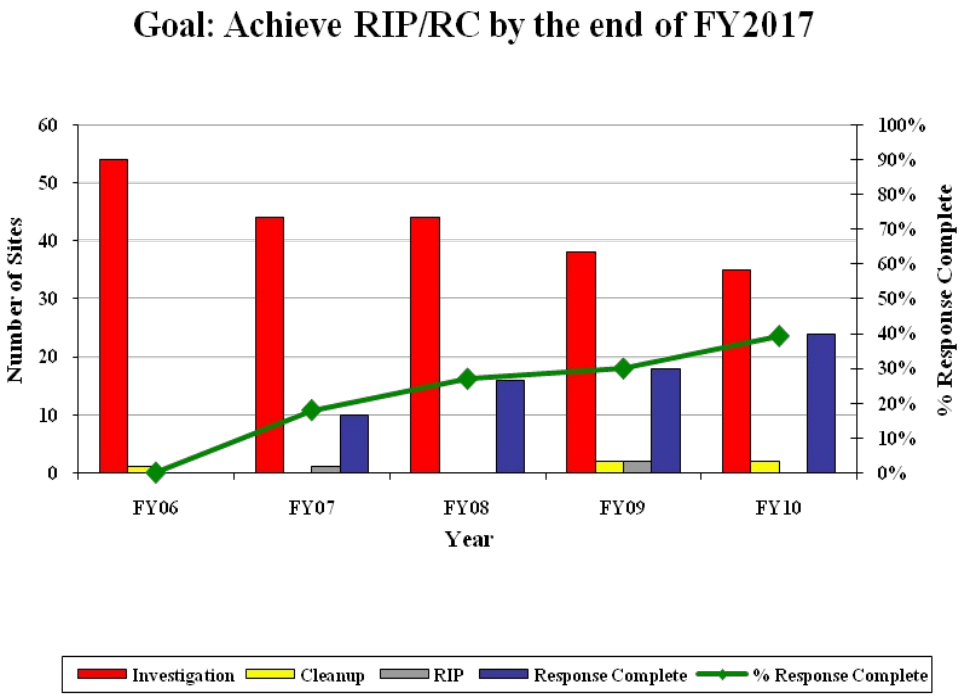
MMRP Cleanup at BRAC 2005 Installations

FY10 Accomplishments

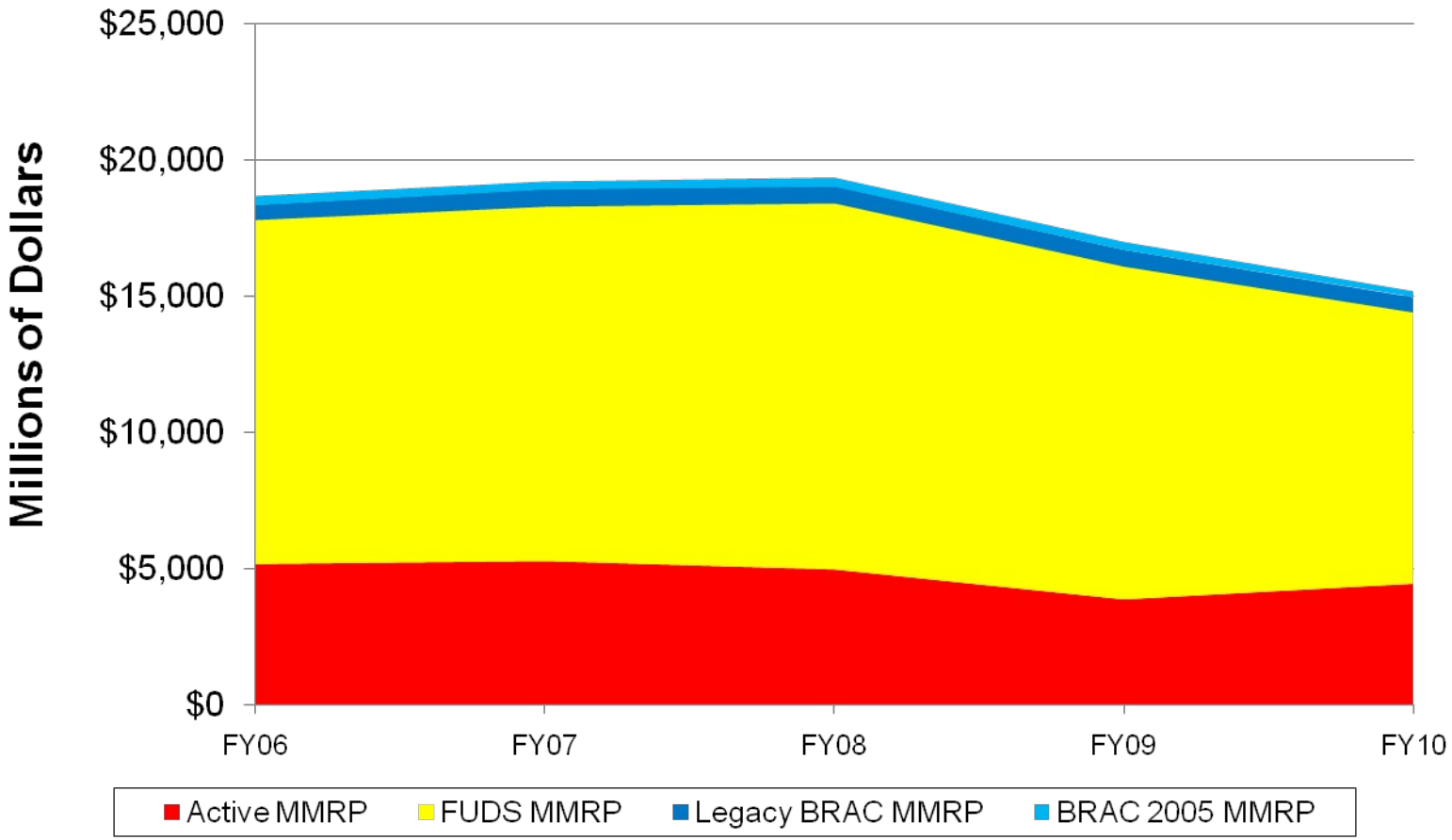
- Completed final study phase at 3 sites
- Achieved RC at 6 sites
  - 9% increase since FY2009



FY11 Projections

- Complete final study phase at 24 sites
- Achieve RC at 12 sites

MMRP: Cost-to-Complete*



*** Includes installation project funding allocated to individual sites**

Questions?

Mr. Vic Wieszek
ODUSD(I&E)/EM
(703) 571-9061
victor.wieszek@osd.mil